

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**REPLY DECLARATION OF RAQUEL KELLERT IN FURTHER SUPPORT OF
DEBTOR'S MOTION TO COMPEL COMPLIANCE
WITH SUBPOENA DUCES TECUM**

I, RAQUEL KELLERT, declare under penalty of perjury that the following is true and correct:

1. I am an attorney at Weil, Gotshal & Manges LLP, counsel for debtors Lehman Brothers Holdings Inc., et al. ("Debtors"). I submit this declaration in further support of Debtors' Motion to Compel Compliance with Subpoena Duces Tecum. The facts set forth below are based on my personal knowledge and are true to the best of my knowledge, information, and belief.

2. Attached as Exhibit A hereto is a true and correct copy of the sworn affidavit of service of Mario Lopez of Metro Attorney Service Inc. asserting that he served on Bond Logistix LLC (1) the instant subpoena duces tecum under Rule 2004 of the Federal Rules of Bankruptcy Procedure and (2) a copy of the Court's Order Granting the Debtors Authority to Issue Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities, dated November 23, 2009 (ECF No. 5910), at 777 South Figueroa Street, Suite 3200, Los Angeles, California.

3. Attached as Exhibit B hereto is a true and correct copy of the Notice of Subpoena Issued Pursuant to Order Granting the Debtors Authority to Issue Subpoenas for the Production

of Documents and Authorizing the Examination of Persons and Entities, dated May 16, 2011
(ECF No. 16846).

Dated: February 13, 2012
New York, New York

/s/ Raquel Kellert
RAQUEL KELLERT

Exhibit A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

Index No. 08-13555

IN RE LEHMAN BROTHERS
HOLDINGS, INC., et al.
Debtor.

AFFIDAVIT OF SERVICE

-----X

STATE OF CALIFORNIA)
 S.S.:
COUNTY OF LOS ANGELES)

MARIO LOPEZ, being duly sworn, deposes and says that he is over the age of eighteen years, is an agent of METRO ATTORNEY SERVICE INC., and is not a party to this action.

That on the 13th day of May, 2011, at approximately 3:01 pm, deponent served a true copy of the SUBPOENA FOR RULE 2004 EXAMINATION and ORDER GRANTING THE DEBTORS AUTHORITY TO ISSUE SUBPOENAS FOR THE PRODUCTION OF DOCUMENTS AND AUTHORIZING THE EXAMINATION OF PERSONS AND ENTITIES upon Bond Logistix at 777 South Figueroa Street, Suite 3200, Los Angeles, California, by personally delivering and leaving the same with William Robertson, Director of Finance Planning, who informed deponent that he is an agent authorized by appointment to receive service at that address.

William Robertson is a white male, approximately 50 years of age, stands approximately 5 feet 10 inches tall, and weighs approximately 190 pounds with brown hair.



MARIO LOPEZ

Sworn to before me this
16th day of May, 2011



NOTARY PUBLIC



Exhibit B

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Richard W. Slack

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
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	:
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**NOTICE OF SUBPOENA ISSUED PURSUANT TO
ORDER GRANTING THE DEBTORS AUTHORITY TO ISSUE
SUBPOENAS FOR THE PRODUCTION OF DOCUMENTS AND
AUTHORIZING THE EXAMINATION OF PERSONS AND ENTITIES**

Pursuant to the Order Granting the Debtors Authority to Issue Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities, entered on November 23, 2009 (the “Order”),¹ the Court granted Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases (together, the “Debtors”) authority to issue subpoenas requiring persons or entities to produce documents to the Debtors and/or submit to examinations by the Debtors.

¹ All capitalized terms used but not defined herein shall have the meanings ascribed to them in the Order.

As required by the Order, the Debtors hereby file notice of a subpoena issued by a Debtor pursuant to the Order. The date the subpoena was served, the name of the witness and the date, time and place of any examination are set forth on “Exhibit 1” attached hereto.

Dated: May 16, 2011
New York, New York

/s/ Richard W. Slack
Richard W. Slack
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

Exhibit 1

NOTICE OF SUBPOENA

Name of Witness:	Bond Logistix
Date of Service of Subpoena:	May 13, 2011
Subject of Subpoena:	Production of Documents, pursuant to Fed. R. Bankr. P. 2004
Date, Time and Place of any Examination:	Documents to be produced by June 13, 2011 at 10:00 A.M. (EST) at Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153